

1 George Haines, Esq.  
2 Nevada Bar No.: 9411  
3 Gerardo Avalos, Esq.  
4 Nevada Bar No.: 15171  
5 **FREEDOM LAW FIRM**  
6 8985 S. Eastern Ave., Suite 350  
7 Las Vegas, Nevada 89123  
8 (702) 880-5554  
(702) 385-5518 (fax)  
Ghaines@freedomlegalteam.com  
*Attorney for Plaintiff Debra K. Sims*

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 Debra K. Sims,

12 Plaintiff,

13 v.

14 Early Warning LLC. and Bank of America  
15 N.A.,

16 Defendant.  
17

Case No.: 2:20-cv-02209-KJD-EJY

**ORDER on**  
**Stipulation of dismissal of Early**  
**Warning Services, LLC with prejudic**  
**e**

18 Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Debra K. Sims and Early  
19 Warning Services, LLC stipulate to dismiss Plaintiff's claims against Early Warning Services,  
20 LLC with prejudice.

21 ///

22 ///

23 ///

Each party will bear its own costs, disbursements, and attorney fees.

Dated: September 10, 2021.

**Freedom Law Firm**

/s/ George Haines

George Haines, Esq.

Gerardo Avalos, Esq.

8985 S. Eastern Ave., Suite 350

Las Vegas, Nevada 89123

*Counsel for Plaintiff Debra K. Sims*

**Troutman Pepper Hamilton Sanders LLP**

/s/ Meagan A. Mihalko

Meagan A. Mihalko (admitted pro hac vice)

1001 Haxall Pt.

Richmond, VA 23219

804-697-1281

[meagan.mihalko@troutman.com](mailto:meagan.mihalko@troutman.com)

**McDonald Carano LLP**

/s/ Rory T. Kay

Rory T. Kay

2300 West Sahara Avenue, Suite 1200

Las Vegas, Nevada 89102

(702) 873-4100

[rkay@mcdonaldcarano.com](mailto:rkay@mcdonaldcarano.com)

*Counsel for Defendant Early Warning Services, LLC*

IT IS SO ORDERED:



UNITES STATES DISTRICT JUDGE

DATED: 9/13/2021